



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

INNA SHAPOVALOVA
Senior Counsel
Phone: (212) 356-2656
Fax: (212) 356-3509
Email: inshapov@law.nyc.gov

June 14, 2023

BY ECF

Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: DeQuan Reyes v. City of New York, et al.
23 Civ. 01145 (LGS)

Your Honor:

I am a Senior Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants the City of New York and Eric Adams in the above-referenced matter.¹ I write to respectfully request an adjournment of the initial pretrial conference currently scheduled for today, June 14, 2023 at 4:10 p.m., to a date and time convenient for the Court after June 26, 2023.² This is defendants' second request of this kind. The undersigned was unable to contact plaintiff for his consent due to his current incarceration status.

On May 25, 2023, Your Honor issued an Order adjourning the initial pretrial conference previously scheduled for May 31, 2023 to June 14, 2023 at 4:10 p.m. See ECF No. 24. Further, the Court ordered defendant City of New York to file a letter to "confirm that Defendant has arranged Plaintiff's participation at the June 14, 2023 conference with GRVC." See id. As

¹ This case has been assigned to Assistant Corporation Counsel Esther Kim, who is awaiting admission to the New York Bar. Ms. Kim is handling this matter under my supervision and may be reached at (212) 356-2340 or eunkim@law.nyc.gov.

² Should the Court be inclined to grant this request, the undersigned respectfully requests that the Court adjourn the initial pretrial conference to a date and time convenient for the Court after June 26, 2023 due to scheduled vacation.

indicated in defendants' June 2, 2023 letter, this Office immediately contacted the liaison at the George R. Vierno Center ("GRVC") on May 25, 2023 to arrange for plaintiff to be produced on June 14, 2023 so that he may participate in the conference scheduled for June 14, 2023 at 4:10 p.m. and provided a copy of the Court's May 25, 2023 Order. See ECF No. 32. However, our Office was just made aware that plaintiff was produced to Queens Supreme Court for his criminal trial and so upon information and belief, plaintiff will not be available to participate in today's conference.

Accordingly, the undersigned respectfully requests that the Court adjourn the initial pretrial conference currently scheduled for June 14, 2023 at 4:10 p.m. to a date and time convenient for the Court after June 26, 2023.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Inna Shapovalova

Inna Shapovalova
Senior Counsel
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**
DeQuan Reyes
Plaintiff pro se
4411-804-847
Rikers Island: G.R.V.C.
09-09 Hazen Street
East Elmhurst, NY 11370